

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

FN HERSTAL, S.A., and	)	
FN AMERICA, LLC,	)	
	)	
Plaintiffs,	)	Civil Action No.: 1:24-cv-218-LCB-JEP
	)	
	)	
v.	)	
	)	
STURM, RUGER & CO., INC.,	)	
	)	
Defendant.	)	
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**DECLARATION OF PATRICIA SHEPARD IN SUPPORT OF CONSENT MOTION TO  
SEAL CONFIDENTIAL MATERIAL FILED IN SUPPORT OF DEFENDANT’S  
OPPOSITION TO PLAINTIFFS’ *DAUBERT* MOTIONS**

I, Patricia Shepard, hereby declare as follows:

1. I am Deputy General Counsel at Sturm, Ruger & Co., Inc. (“Ruger”). I submit this declaration in support of Ruger’s Consent Motion to Seal Confidential Material Filed In Support of Ruger’s Opposition to FN’s *Daubert* Motions. The facts in this Declaration are based on my personal knowledge.

2. The information Ruger seeks to redact in its Opposition to Plaintiffs’ Motion to Exclude Certain Testimony and Opinions of Ruger Expert W. Todd Schoettelkotte reveals Ruger’s financial figures, namely, its revenues and profits, for its Small-Frame Autoloading Rifle, or SFAR.

3. Ruger has never made this information public, and it keeps these financial figures confidential.

4. Revealing these financial figures would give others in the industry a competitive advantage because these figures can be used to project future sales, understand product success,

adapt marketing and advertising plans, and adjust future product development plans, which is why Ruger takes steps to keep this financial information private and confidential.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Wethersfield, Connecticut on May 16, 2025.



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Patricia Shepard  
Deputy General Counsel  
Sturm, Ruger, & Co., Inc.